

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**No. 21-CR-0668-JB**

**TIFFANY ROBINSON,**

**Defendant.**

**UNOPPOSED SECOND MOTION TO CONTINUE TRIAL  
AND MOTION TO EXTEND TIME TO FILE MOTIONS**

Defendant Tiffany Robinson (“Ms. Robinson”), through undersigned counsel, respectfully moves the Court to continue the trial currently set for October 8, 2021, for sixty (90) days, and to grant a corresponding extension of time to file motions. As grounds for this motion, Ms. Robinson states the following:

1. Ms. Robinson was indicted on May 12, 2021, on counts of possession of methamphetamine with the intent to distribute and felon in possession of a firearm. Doc. 2. She was arraigned on June 11, 2021. Undersigned counsel was retained to represent Ms. Robinson on July 27, 2021. Doc 17.
2. The parties are currently engaged in informal, ongoing, plea negotiations. As part of plea negotiations, undersigned counsel is in the process of attempting to interview witnesses and obtain documents regarding Ms. Robinson’s prior, 2019, state court plea agreement as the facts and circumstances may provide the parties with mitigating information to consider during the current plea negotiations. Absent the parties being able to reach a plea agreement in this case, undersigned counsel is also in the process of drafting a suppression motion and requires

additional time to complete his investigation regarding the facts and circumstances surrounding the procurement and execution of the subject search warrant in this case.

4. This is the second request for a continuance.

6. Ms. Robinson is in custody, however, after a hearing on Ms. Robinson's Motion Appealing Detention Order (Doc. 19), the Court has authorized Ms. Robinson to be reside at a halfway house. Doc. 28. Ms. Robinson is currently on a wait list to be transferred to a halfway house. Id.

7. AUSA Shana Long does not oppose this motion.

Pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), a continuance will allow for the reasonable time necessary to engage in ongoing plea negotiations, obtain and review discovery related to a prior related felony prosecution of Ms. Robinson, to prepare and file relevant motions, and to investigate all possible defenses, considering the exercise of diligence. The requested continuance will not give rise to a Speedy Trial Act violation. The additional time required by the continuance may properly be excluded under 18 U.S.C. § 3161(h)(7) on the ground that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial. Failure to grant the continuance would "deny counsel for the defendant ... the reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. § 3161(h)(7)(B)(iv).

WHEREFORE, for the foregoing reasons, the Defendant (Ms. Robinson), through undersigned counsel, respectfully requests that this Court vacate the current jury trial setting of October 8, 2021, and related motions deadlines.

Respectfully Submitted:

By: /s/ Joe M. Romero, Jr.  
Joe M. Romero, Jr.  
ROMERO & WINDER, PC  
*Attorney for Defendant*  
1905 Lomas Blvd, NW  
Albuquerque, NM 87104  
Phone: (505) 843-9776  
Fax: (505) 212-0273  
[joe@romeroandwinder.com](mailto:joe@romeroandwinder.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1<sup>st</sup> day of October 2021, I filed the foregoing electronically through the CM/ECF system and served the same to opposing counsel.

By: /s/ Joe M. Romero, Jr.  
Joe M. Romero, Jr.